

U.S. DISTRICT COURT
EASTERN DISTRICT-WI
FILED

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

Police Officer Jasmine C Lewis
4724 W Deer Run Dr. #206
Brown Deer, Wisconsin 53223

JON W. SANFILIPPO
CLERK

08-C-1040

VS

City of Milwaukee
City Attorneys Office 200 East Wells Street Milwaukee, wisconsin 53202
Nannette Hagerty(Former Police Chief),

COMPLAINT

1. PREVIOUS LAWSUITS

- A. Have you begun other lawsuits in state or federal court relating to the Same occurrence involved in this action? YES ☒ NO
- B. Have you begun other lawsuits in state or federal court? YES
- C. If your answer to A or B was Yes, provide the requested information Below. If there is more than one lawsuit, describe each additional One on a separate sheet of paper, using the same outline.

1. Parties to the previous lawsuit.

Plaintiff(s) Police Officer Jasmine C Lewis

Defendant(s) City of Milwaukee Police Department

2. Court in which lawsuit brought (if federal court, name district
If state court, name the county)

FEDERAL COURT EASTERN DISTRICT OF WISCONSIN

3. Docket number **2:05-cv-0042RTR**
4. Current status (for example. Was the case dismissed? Was it appealed is it still pending?)
Unknown of why case was Dismissed / Process of Reopening case
5. Approximate date of filing lawsuit 04/13/2005
6. Approximate date of disposition 08/04/2008

I PARTIES

- A. Your name (PLAINTIFF) Ms. Jasmine C Lewis
- B. Your Address 4724 West Deer Run Dr. #206 Brown Deer Wisconsin 53223
- C. DEFENDANT (name) City of Milwaukee – Nannette Hagerty (former Chief)
- D. Defendants address Office of City Attorney 200 East Wells Street
Milwaukee, Wisconsin 53202-3551
- E. Additional DEFENDANTS: Dpty Inspt. Gregory Thompson
Lt Ronald Quackenbush, Lt Phillip J Tuczynski, Lt Leslie Thiele
Sgt Djveit

Mr. Donald Feinsilver – Physician Tower 2424 S 90th str.
Suite 402, West Allis, Wi 53227

Mr. Nicholas Claditis -16655 W Bluemound Rd.
Suite 301 Brookfeild, Wi 53005

II. STATEMENT OF CLAIM follow instructions carefully)

State briefly as possible the essential facts of your case. Tell what each defendant did to you that Caused you to file this suit against them. If you are complaining about more than one wrong, use a Separate **numbered** paragraph for each wrong, and describe each wrong in that paragraph and only That paragraph. State only the facts. Do not give any legal theories or arguments, do not cite any Cases or statutes. **Do not feel you have to use all the space. USE NO MORE THAN THE SPACE PROVIDED THE COURT STRONGLY DISAPPROVES OF STATING CLAIMS OUTSIDE THE SPACE PROVIDED.**

2. PREVIOUS LAWSUITS

A. Have you begun other lawsuits in state or federal court relating to the Same occurrence involved YES NO

B. Have you begun other lawsuits in state or federal court? YES

C. If your answer to A or B was Yes . provide the requested information Below. If there is more than one lawsuit, describe each additional One on a separate sheet of paper, using the same outline.

1. Parties to the previous lawsuit

Plaintiff(s) Ms. Jasmine C Lewis Miss Lennie V Lewis

Defendant(s) First Weber Realestate Corporation
Consumer First Properties William Guy Cekosh

2. Court in which lawsuit brought (if federal court, name district if state court, name the county)

FEDERAL COURT EASTERN DISTRICT OF WISCONSIN

3. Docket number: 08-C-0985

4. Current status (for example was the case dismissed? Was it appealed? is it still pending)? Case is still pending

5. Approximate date of filing lawsuit. 11/17/2008

6. Approximate date of disposition N/A

Pargh 1.

On February 19th 2001 I joined the Milwaukee Police Department as a Milwaukee Police Officer. I performed my duties to a satisfactory level resided in the city of Milwaukee through out my career. I'm an African-American adult female, Single mother or two, residing in the Villiage of Brown Deer Milwaukee County , State of Wisconsin. In 2005 I filed a Sexual Harassment and Discrimination case with the EEOC regarding my employer city of Milwaukee Police Department under the command of the Former Police Chief Nannette Hagerty. In filing the charge it caused a hostile work enviroment and intentional retaliation from other employees while in their official capacity. The retaliation then was directed towards my personal and private life causing, emotional pain, suffering, humiliation, embarrassment, mental anguish and harm. In my personal and professional relations. Former chief Nannette Hagerty knew that my constitutional and civil rights were being violated from the Matter of's letters that I submitted officialy to her. Nannette Hagerty also knew that the majority of the intentional discriminatory practices and the malicious conduct, I endured was from the Leiutnants and sergeants under her command.

Pargh 2.

On October 6, 2006 I arrived to work as a city of Milwaukee Police Officer on late shift patrol. I was then approached by Sgt. Djveit from Prisoner Processing, he stated that Lt. Phillip Tuczynski wanted to see me in the Captain's office. When I entered the office, Deputy Inspector Gegory Thompson was there also. He stated that he was following orders and given information that I was no longer fit for duty and to surrender certain police equipment. I wasn't given any further information, never received any prior notification of any disciplinary actions or pending suspensions. When I requested union representation I was told no. This was a violation of the Law Enforcement Officers' Bill of Rights. The door to the Captain's office was closed and being guarded by Sgt. Djveit. This was being done to prevent me from leaving the room and calling for Representation. During the course of events I was assaulted by Sgt. Djveit and received an injury to my right shoulder, along with pain and swelling to the arm and wrist. All of the persons listed above were only concerned with injustice, prejudice and unfairness. Through their actions, words and deeds in violation of equal protection under the law. The listed individuals, in combined conspiracy among themselves, had improper ulterior motives for their violation of my constitutional and civil rights.

Pargh 3.

Included in these acts were mandatory fitness for duty reports, These reports were being used in a discriminatory manner also as a tool to discredit me and defamation of character. The reports were never kept confidential it gave the department the ability not to investigate any wrong doing of their supervisor staff. The reports demoralized me as a human being, contained inaccurate information or statements that were taken out of contexts. Expectation of any privacy was gone, and opened the doors to more humiliation and malicious acts. While stationed at the property section under the command of Lt. Ronald Quakenbush I was labeled a thief, was blamed for any property that was damaged, misplaced or thrown out. Any malicious acts towards me were willfully and knowingly encouraged. While stationed at District one, under the late shift command of Lt. Lesile Thiele and Lt. Phillip Tuczynski, I was labeled incompetent, and many other character damaging statements.

All of the listed persons violated and deprived me of liberty concerning **the right to be left alone and pursue one's chosen profession without interference and harassment** under the liberty clause of due process in the fifth Amendment and persons continue to do so.

IV. RELIEF YOU REQUEST

State exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes. DO NOT USE THIS SPACE TO STATE THE FACTS OF YOUR CLAIM. USE IT ONLY TO REQUEST REMEDIES FOR THE INJURIES YOU COMPLAIN ABOUT. Use only the space provided. The court strongly disapproves of requesting remedies outside the space provided.

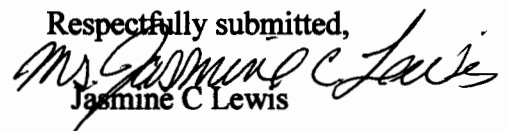
Due to the severe harassment, intimidation and illegal acts, I have endured and have suffered great harm, loss of reputation, loss of liberty and property, loss of due process of law and equal protection of the law I'm asking the court for damages in the amount of Twenty Million Dollars (\$20,000,000) and any other amount deemed sufficient by the court that will punish and deter the defendants from further engaging in such unlawful conduct now and in the future. Other damages regarding employment issues will be specified in court.

Requesting for Temporary and Permanent injunction due to the continuing abuse, actions and violations of substantial rights, I fear that irreparable and irreversible harm physical and emotional will result if the Court does not issue a temporary injunction and finally, a permanent injunction.

I declare under penalty of perjury the foregoing is true and correct.

Complaint signed this 5th day of December, 2008

Respectfully submitted,


Jasmine C Lewis

U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

DISMISSAL AND NOTICE OF RIGHTS

To: **Jasmine Lewis**
2840 W Vera Avenue
Milwaukee, WI 53208

4724 W Peer Run Dr #206
Brown Deer, WI 53223

From: **Milwaukee Area Office**
310 West Wisconsin Ave
Suite 800
Milwaukee, WI 53203



On behalf of person(s) aggrieved whose identity is
CONFIDENTIAL (29 CFR §1601.7(a))

EEOC Charge No.

EEOC Representative

Telephone No.

443-2007-00922

Shannon M. Lemke,
Investigator

(414) 297-3990

THE EEOC IS CLOSING ITS FILE ON THIS CHARGE FOR THE FOLLOWING REASON:



The facts alleged in the charge fail to state a claim under any of the statutes enforced by the EEOC.



Your allegations did not involve a disability as defined by the Americans With Disabilities Act.



The Respondent employs less than the required number of employees or is not otherwise covered by the statutes.



Your charge was not timely filed with EEOC; in other words, you waited too long after the date(s) of the alleged discrimination to file your charge



The EEOC issues the following determination: Based upon its investigation, the EEOC is unable to conclude that the information obtained establishes violations of the statutes. This does not certify that the respondent is in compliance with the statutes. No finding is made as to any other issues that might be construed as having been raised by this charge.



The EEOC has adopted the findings of the state or local fair employment practices agency that investigated this charge.



Other (briefly state)

- NOTICE OF SUIT RIGHTS -

(See the additional information attached to this form.)

Title VII, the Americans with Disabilities Act, and/or the Age Discrimination in Employment Act: This will be the only notice of dismissal and of your right to sue that we will send you. You may file a lawsuit against the respondent(s) under federal law based on this charge in federal or state court. Your lawsuit must be filed WITHIN 90 DAYS of your receipt of this notice; or your right to sue based on this charge will be lost. (The time limit for filing suit based on a state claim may be different.)

Equal Pay Act (EPA): EPA suits must be filed in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.

On behalf of the Commission

Enclosures(s)

John P. Rowe,
Director

SEP 08 2008

(Date Mailed)

cc: **CITY OF MILWAUKEE - POLICE DEPT**
Attn: Marynell Regan, Assistant City Attorney
Office Of The City Attorney
Milwaukee City Hall, Suite 800
200 East Wells Street
Milwaukee, WI 53202